



Sullivan & Worcester LLP
1633 Broadway
New York, NY 10019

T 212 660 3000
F 212 660 3001
www.sandw.com

MEMO ENDORSED

June 25, 2014

VIA ECF AND EMAIL

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: June 25, 2014

**Re: Nat'l Union Fire Ins. Co. of Pittsburgh, Pa. v. Arena One Football, L.L.C.,
14 CV 3435 (KPF)**

Dear Judge Failla:

We represent Arena One Football, L.L.C. ("Arena One") in the referenced matter. We write, on behalf of all parties jointly, to request an adjournment of Arena One's deadline to respond to the petition in this matter. The current deadline for Arena One's response is June 27, 2014. The reason for the request is that, on June 24, 2014, the parties agreed to submit the dispute to mediation and want to avoid spending legal fees on litigation when the case might settle.

Under the parties' agreement, the mediation is scheduled to commence on July 17, 2014. Based on that date, we suggest that Arena One's deadline to move or answer in response to the petition be extended to no earlier than July 24, 2014. Prior to that deadline, the parties should be in a position to advise the Court as to whether a settlement has been reached or is imminent.

This is the first application to extend the deadline for purposes of settlement discussions. Previously, Arena One had requested and the Court granted (on May 29, 2014) an extension of the deadline for responding to the petition until June 25, 2014. The purpose of that request was to give Arena One more time to analyze and respond to the petition. This request is for a different reason, mediation, and is jointly made. We note, however, that in its May 29 Order, the Court stated its expectation that there will be no further extensions during the remainder of this litigation. The parties are mindful of this expectation and do not anticipate the need for any further extensions.

Respectfully submitted,

Andrew T. Solomon

cc: Thomas L. Vogt, Esq. (via email)
Andrew D. Hart, Esq. (via email)

June 25, 2014

Application GRANTED. Respondent's time to respond to the petition is extended to July 24, 2014. No further extensions will be granted absent good cause shown.

The Clerk of Court is directed to terminate Docket Entry 12.

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE